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*Attorneys for Defendants World
Wrestling Entertainment, LLC, and
Fanatics, LLC*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

WESLEY EISOLD, an individual,
Plaintiff,

vs.

CODY GARRETT RUNNELS, an
individual, WORLD WRESTLING
ENTERTAINMENT, LLC, a limited
Liability company; and FANATICS,
LLC, a limited liability company,

Defendants.

Case No.: 2:24-CV-07516-AB(MARx)
[Hon. André Birotte Jr.]

**JOINT STIPULATION TO
EXTEND TIME TO RESPOND TO
PLAINTIFF'S SECOND
AMENDED COMPLAINT BY NOT
MORE THAN 30 DAYS**

Action Filed:
September 4, 2024

Second Amended Complaint Filed:
December 16, 2024

Current Response Date:
December 30, 2024

New Response Date:
January 17, 2025

Trial Date:
TBD

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**JOINT STIPULATION TO EXTEND TIME TO RESPOND TO SECOND AMENDED
COMPLAINT**

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JOINT STIPULATION

This Joint Stipulation is entered into by and between Defendants Cody Runnels (“Runnels”), World Wrestling Entertainment, LLC (“WWE”), Fanatics, LLC (“Fanatics”), and Plaintiff Wesley Eisold (“Eisold”) (Runnels, WWE, Fanatics, and Eisold are collectively referred to hereinafter as the “Parties”), by and through their respective counsel.

WHEREAS, Eisold filed his Complaint against Defendants on September 9, 2024 (Dkt. No. 1);

WHEREAS, on October 10, 2024, Eisold, WWE, and Fanatics stipulated to a thirty-day extension of time for WWE and Fanatics to respond to Eisold’s Complaint (Dkt. No. 15), and Eisold and Runnels later entered into a stipulation to coordinate his response with the other Defendants on October 25, 2024 (Dkt. No. 19);

WHEREAS, on October 24, 2024, the Parties stipulated that Eisold would amend his Complaint to correct an error in Fanatics’ name (Fanatics was erroneously sued as Fanatics Holdings, Inc. instead of Fanatics, LLC) and that this amendment should not constitute Eisold’s amendment as of right under Rule 15(a) of the Federal Rules of Civil Procedure (Dkt. No. 17);

WHEREAS, on October 30, 2024, the Court approved the Parties’ October 24, 2024, Stipulation to Amend (Dkt. No. 22);

WHEREAS, on November 1, 2024, Eisold filed, pursuant to the October 30, 2024, Order, his First Amended Complaint (Dkt. No. 23);

WHEREAS, on November 22, 2024, WWE and Fanatics filed a Motion to Dismiss Plaintiff’s First Amended Complaint (Dkt. No. 26), in which Runnels joined, along with his own Motion to Dismiss (Dkt. Nos. 28, 29);

WHEREAS, on November 26, 2024, the Court entered an Order setting the Rule 26 Scheduling Conference (Dkt. No. 30);

WHEREAS, on December 13, 2024, Eisold filed his Second Amended Complaint (Dkt. No. 34);

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WHEREAS, on December 16, 2024, the Court issued a Notice of Deficiency with respect to Eisold's Second Amended Complaint on the basis that Eisold needed a stipulation or leave of court to file the amended pleading;

WHEREAS, based on the December 16th filing, which Defendants agree is procedurally proper based on the Parties' October 24, 2024 stipulation, the Defendants' (Runnels, WWE, and Fanatics) last day to file an answer or other responsive pleading is December 30, 2024;

WHEREAS, the Parties have agreed that, due to holiday scheduling issues and the need for counsel to coordinate responsive motions and/or pleadings, good cause exists to extend the time for Defendants to respond to Plaintiff's Second Amended Complaint up to, and including, January 17, 2025.

NOW, THEREFORE, the Parties, by and through their respective undersigned counsel of record, hereby stipulate as follows:

The responsive pleading of Runnels, WWE, and Fanatics may be filed on or before January 17, 2025.

Dated: December 27, 2024 HOLLAND & KNIGHT LLP

/s/ Stacey H. Wang

Stacey H. Wang, Esq.
Danielle N. Garno, Esq.

*Attorneys for Defendants
World Wrestling Entertainment, LLC and
Fanatics, LLC*

Dated: December 27, 2024 KING HOLMES PATERNO AND SORIANO LLP

/s/ Heather Pickerell

Heather Pickerell, Esq.

Attorneys for Plaintiff, Wesley Eishold

1 Dated: December 27, 2024 JAYARAM PLLC

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3 /s/ Vivek Jayaram
Vivek Jayaram, Esq.

4 *Attorney for Defendant, Cody Runnels*
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DECLARATION OF CONSENT TO ELECTRONIC SIGNATURE:

I, Stacey H. Wang, attest pursuant to L.R. 5-4.3.4 of the United States District Court for the Central District of California that the above signatories, on whose behalf the filing is submitted, concurs in the filing's content and has authorized the filing.

Dated: December 27, 2024

/s/ Stacey H. Wang
Stacey H. Wang, Esq.

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